

# **EXHIBIT**

## **42**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

GERALDINE LAUTURE

Plaintiff

v.

Civil Action No.: CCB-08-943

ST. AGNES HOSPITAL

Defendant

**NOTICE OF DEPOSITION**

Please take notice that the oral depositions of the person or persons designated by Defendant, St. Agnes Hospital to testify concerning the following matters, will be taken at 10:00 a.m. on Tuesday, March 17, 2009 at the law offices of Amity, Kum & Suleman, P.A., Maryland Trade Center II, 7474 Greenway Center Drive, Suite 650, Greenbelt, Maryland 20770 before a notary public or other person authorized to administer an oath. The deposition will be taken and be recorded by court reporter and/or videographer for the purpose of discovery and for other lawful purposes. The deposition will continue from day to day until completed.

You are notified that Plaintiff wishes to examine the witness or witnesses so designated on the following matters;

1. Identification of Defendant.
2. Plaintiff's complaints against Jane Weiger and Margaret Kinch.
3. Plaintiff's complaints against Stephanie Rutter.
4. Investigation of Plaintiff's complaints by Defendant.

Date 3-17-09

*Harold*

DEPOSITION EXHIBIT# 1

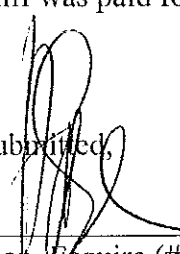
SUZANNE GILES, CVR  
COMPOFELICE REPORTING SERVICES, INC.  
(301) 596-2019 FAX (410) 290-7249

5. Defendant's policies and practices relating to employees discipline and discharge.
6. Defendant's policies and practices relating to retraining of employees.
7. Defendant's anti-discrimination policies, training, and practices.
8. Defendant's defenses.

You are further notified that such person or persons designated by Defendant are to bring with them the following items or things:

1. All documents evidencing or showing or relating to training of Defendant's supervisors on Defendant's anti-discrimination policies from January 2004 to date.
2. All paystubs or other documents showing that Plaintiff was paid for the period of Plaintiff's suspension by Defendant on February 8, 2006.
3. All paystubs or other documents showing that Plaintiff was paid for the period of March 10, 2006 through March 24, 2006.

Respectfully submitted,



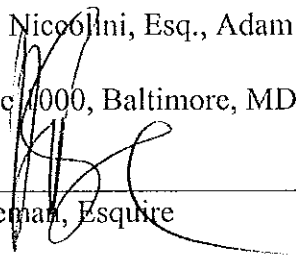
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Fatai A. Suleman, Esquire (# 14431)  
Amity, Kum & Suleman, P.A.  
7474 Greenway Center Drive, Suite 650  
Greenbelt, MD 20770.  
Phone: 301-982-3434.  
Fax: 301-982-3411  
Email: [faslaw@ask-lawyers.net](mailto:faslaw@ask-lawyers.net)

Plaintiff's Attorney.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 12<sup>th</sup> day of March 2009, a copy of the foregoing Plaintiff's Notice of Taking Deposition of Defendant was mailed by first class mail, postage prepaid to Defendant's attorneys, Robert R. Niccolini, Esq., Adam H. Garner, Esq., McGuireWoods LLP, 7 St. Paul Street, Suite 1000, Baltimore, MD 21202.

  
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Fatai A. Suleman, Esquire